

Bay Delta Conservation Plan

Document Review Comment Form

Please use this form to document your comments to the EIR/EIS Draft Work Plan. Please number your comments in the first column and indicate the page, section, and line number (if provided) that reference the comment's location in the review document.

To be of the greatest value to the document development process, please make your comments as specific as possible (e.g., rather than stating that more current information is available regarding a topic, provide the additional information [or indicate where it may be acquired]; rather than indicating that you disagree with a statement, indicate why you disagree with the statement and recommend alternative text for the statement). Do not enter information in the Resolution column.

Document: BDCP EIR/EIS Draft Work Plan	Date Comments Requested by: 8/19/2011
Comments Submitted By: Laura Fujii, Environmental Review Office Affiliation: Region 9 US EPA NOTE: Review based on quick skim of Sections of interest to US EPA.	Date Comments Submitted: 8/24/11

NO.	SECTION #	PAGE #	LINE #	COMMENT	RESOLUTION
1	Section 3	3-2		General Recommendations appear reasonable. Of note are: elimination of redundancy and inconsistencies, ensuring consistency with headings; timeframes; clarifying project-level (conveyance) and program-level (conservation) analysis; cross referencing sections and chapters; clarifying differences of effects between alternatives.	
2	Section 3	3-2		In addition to cumulative impact analysis in each resource chapter consider wrap-up cumulative impact analysis section at end of EIS to provide a consolidated summary of cumulative impacts.	
3	Section 3	3-3		Primer on California Water Delivery Systems and the Delta is a good idea.	
4	Operations or Governance Section			EIS should describe the assurances and governance processes being provided to ensure program-level actions (conservation) are implemented in parallel or before project-level actions (conveyance).	

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5	5	Section 3 : Chapter 5 Water Supply	3-7		The narrative states no effects were simulated for San Joaquin River inflows to the Delta or effects for Sacramento since the BDCP would have few effects on reservoir operations. <i>Recommendation:</i> The EIS should include a description and effects evaluation of potential changes in SWP/CVP operations system-wide as a result of BDCP, e.g. which reservoirs could be operated differently; how would operations change the intensity, magnitude and timing of reservoir releases.	
6	6	Section 3: Chapter 7 Groundwater	3-13		The narrative states that major groundwater effects will be localized near-surface changes in seepage which could require drainage for agricultural lands such as tile drains. <i>Recommendation:</i> Consider description and evaluation of the effects of major mitigation measures such as tile drains, and other major infrastructure.	
7	7	Section 3: Chapter 8 Water Quality	3-14		Revision recommendations would focus on effects of reservoir operations on water quality especially salinity and EC, evaluating only changes to water quality caused by BDCP alternatives. <i>Recommendation:</i> the EIS should consider other key water quality issues such as temperature, heavy metals, timing and magnitude of flows. We recommend caution when considering the breadth of the effects analysis for water quality.	
8	8	Section 3: Chapter 8 Water Quality	3-14		A BDCP Water Quality Effects diagram would be a very good idea.	
9	9	Section 3: Chapter 11 Fish and Aquatic Resources	3-20		Recommendations appear reasonable. <i>Recommendation:</i> We recommend EPA be included, as appropriate, in development and early review of Chapters on Surface Water, Water Quality, Fish and Aquatic Resources; and other resources areas which overlap EPA authorities.	

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10	10	Section 3: Chapter 12 Terrestrial Biological Resources	3-23		Recommendations appear reasonable. Of note is the recommendation that there be discussions of effects on natural communities, covered species, and on - covered species for alternatives should be expanded to include a qualitative analysis of effects from changes in water operations both upstream and in-stream of the conservation plan area. Water operations changes should include reservoir fluctuations, river flow modification below dams, and increases in water available to agriculture in the CVP and SWP water service areas.	
11	11	Section 3: Chapter 22 Air Resources and GHG	3-43		Recommendations appear reasonable, especially recommendations to reduce redundancy with the climate change chapter; ensuring consistency of methodology with technical accuracy and consistency with State and Federal requirements; and including a General Conformancy Analysis.	
12	12	Section 3: Chapter 29 Climate Change	3-55		The EIS may need to clarify that the Climate Change chapter focuses on the effect of climate change on BDCP and project adaptation measures, while BDCP effects on GHG emissions and climate change are addressed in the Air Resources and GHG chapter.	
13	13	Section 3: Chapter 31 CEQA Effects of the Proposed Project and Alternatives	3-57		The Recommendations state there was a decision to remove CEQA-specific language and analysis from specific resource chapters to an CEQA effects chapter. We concur with the recommendation that the CEQA Effects chapter and resource chapters be revised to be mutually consistent. The EIS should describe the rational for the decision to have a separate CEQA Effects chapter, and pros and cons of such an approach.	